

EXHIBIT B

Filed with the Court

APR 07 2016

Paula T. Dow, P.J.Ch.

PREPARED BY THE COURT

RICHARD STANHOPE, Plaintiff, v. BANK OF AMERICA, N.A., PNC BANK, N.A., DEBORAH and HARRY FRAKE, III, ET AL., Defendants.	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION BURLINGTON COUNTY DOCKET NO. C-110-14 CIVIL ACTION CASE MANAGEMENT ORDER
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THIS MATTER having come before the Court by way of Case Management on April 7, 2016, with Plaintiff Richard Stanhope being represented by Lisa Buckalew, Esq. and Richard Kim, Esq.; Defendant, Bank of America, being represented by Siobhan E. Moran, Esquire; and Defendants Deborah and Harry Frake not appearing and for good cause shown;

IT IS ON THIS 7th day of April, 2016 ORDERED that:

1. All dispositive motions regarding claims against Defendants Deborah and Harry Frake shall be filed on or before April 29, 2016;
2. Mediation is ordered to be conducted in this case between Plaintiff and Defendant Bank of America, to be completed by April 29, 2016. Mediation is to proceed in tandem with ongoing discovery. Discovery deadlines will not be extended due to mediation discussions;
3. Counsel for Plaintiff and Defendant Bank of America are ordered to meet and confer by April 13, 2016 to discuss any outstanding discovery disputes, selection of a mediator, and any other pertinent issues;
4. Counsel for Plaintiff and Defendant Bank of America shall report back to the Court by April 14, 2016 via joint letter as to the outcome of discussions;
5. Counsel for Plaintiff and Defendant Bank of America are to notify the Court of a mutually agreed upon mediator within their April 14, 2016 letter;

6. Alternatively, if no mediator can be agreed upon, counsel for Plaintiff and Defendant Bank of America shall provide the Court with 2 possible Mediators who are ready and able to provide mediation services and the Court shall make a selection of its own choosing;
7. There will be no further adjournments or delays of the trial date. Trial remains scheduled for June 6, 2016 at 9:00 a.m.
8. A pretrial conference remains scheduled for May 4, 2016 at 9:00 a.m.

IT IS FURTHER ORDERED that a copy of this order shall be served upon all appearing parties within seven days of its receipt.

A handwritten signature in black ink, appearing to read "Paula T. Dow", is written over a horizontal line.

Hon. Paula T. Dow, P.J.Ch.

File No. 0737
the Court

MAR 21 2016

Paula T. Dow, P.J.Ch.

Attorneys for Plaintiff, Richard Stanhope

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Richard Stanhope

Plaintiff,

v.

Bank of America, N.A., Deborah Carter
Frake, Harry Frake, III, John and Jane Doe
1-5, AND ABC Corps, 1-5.

Defendants.

:
: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION
: BURLINGTON COUNTY
:
: DOCKET NO.: C-110-14
:
: CIVIL ACTION
:
: ORDER GRANTING: (1) PLAINTIFF'S
: MOTION TO COMPEL DISCOVERY &
: MORE SPECIFIC ANSWERS TO
: INTERROGATORIES FROM
: DEFENDANT BANK OF AMERICA.,
: N.A.; AND (2) SANCTIONS AGAINST
: BANK OF AMERICA, N.A.
:

This matter having been brought before the Court upon Motion filed by The Kim Law Firm, LLC, on behalf of Plaintiff Richard Stanhope, to Compel Discovery and More Specific Answers to Interrogatories From Defendant Bank of America, N.A. ("Bank of America") and the Court having reviewed all papers submitted, and the opposition, if any, by Defendant Bank of

America, N.A.:

IT IS on this 21st day of March, 2016, ORDERED that:


1. Within seven (7) days from the date of this Order, Defendant Bank of America, N.A. shall provide full and complete answers, without objections, to Plaintiff's 2, 4, 5, 26, 30, 31, 33, 34, 36, 45, 46, 48, 52 and 53 Interrogatories numbers ~~2, 4, 5, 18, 20, 25, 26, 28, 30, 31, 33, 34, 36, 45, 46, 48, 52, and 53~~, as requested in Plaintiff's letter to Bank of America, N.A. dated December 11, 2015.
2. A, Within seven (7) days from the date of this Order, Defendant Bank of America, N.A. shall provide supplemental responses and all documents requested in Plaintiff's First Request for Production of Documents numbers 3, 4, 12, 14, 15, 22, 27, 28 and 29 ~~3, 4, 5, 18, 20, 25, 26, 28, 30, 31, 33, 34, 36, 45, 46, 48, 52, and 53~~, as requested in Plaintiff's letter to Bank of America, N.A. dated December 11, 2015, and B. Plaintiff is Ordered to sign a Confidentiality Agreement regarding certain of Defendant Bank of America's records sought herein.
3. Within seven (7) days from the date of this Order, Defendant Bank of America, N.A. shall provide a certification of completeness pursuant to R. 4:18-1(c) regarding Defendant Bank of America, N.A.'s document production;
4. ~~Defendant Bank of America, N.A. is sanctioned and precluded from introducing any evidence now, or at the time of trial, that contradicts that a \$1,000 withdrawal limit was in place for Plaintiff's checking account;~~
5. ~~Defendant Bank of America, N.A. is sanctioned and precluded from introducing any evidence contradicting that it had a \$10,000 transfer limit in place between Mr. Stanhope's checking and savings accounts;~~

DEIVED (4) without prejudice
 DEIVED (5) without prejudice

6. ~~Defendant Bank of America, N.A. is sanctioned and precluded from introducing~~
any evidence contradicting the existence of fraud reimbursement/protection
~~policies being in place for Plaintiff's checking and savings account;~~

7. Defendant Bank of America, N.A. is sanctioned and must provide Plaintiff's
counsel ~~and~~ attorneys' fees; and to be determined

10. Plaintiff's counsel shall serve this Order upon Bank of America, N.A.'s counsel
within five (5) days of the date of receipt of this Order.


Paula T. Dow, J.S.C.

☒ Opposed

☐ Unopposed

8. Plaintiff is Ordered to supply and serve a certification
of fees and costs within 14 days of this Order.

9. A Case Management Conference ~~will~~ will be
held on April 7, 2016 at 10:30 a.m.
Defendant Bank of America is directed
to appear in person with a representative
of the client Bank attending.

Mar. 17. 2016 3:00PM

No. 0702 P. 1

5166785661

Moran Karamouzis LLP

03:59:07 p.m. 2016-03-16

2/4

Filed with the Court

MAR 07 2016

Paula T. Dow, P.J.Ch.

ID No.: 023791987
Slobhan E. Moran, Esq.
MORAN • KARAMOUZIS LLP
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(516) 678-6660
(516) 678-6661

Attorneys for Plaintiff Bank of America, N.A.

RICHARD STANHOPE,

Plaintiff,

-against-

BANK OF AMERICA, N.A., FNC BANK, N.A.,
DEBORAH and HARRY FRAKE, III, et al,

Defendants,

SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY
CHANCERY DIVISION

CIVIL DIVISION

DOCKET NO.: C-110-14

ORDER

THIS MATTER having been opened to the Court by Slobhan E. Moran of Moran • Karamouzis, LLP, an attorney admitted to the practice of law in the State of New Jersey, to participate with other counsel for Bank of America, N.A. in all phases of trial, and it appearing that Marc T. Parrino is a licensed attorney in good standing in the State of Florida, and it appearing that Marc T. Parrino has a longstanding attorney-client relationship with Bank of America, N.A. and a background in, knowledge of and experience in legal issues similar to those present in this matter;

The Court having considered the papers and arguments of counsel and for good cause shown;

IT IS on this 7th day of March, 2016

Mar. 17. 2016 3:01PM

No. 0702 P. 2

5166786661

Moran Karamouzis LLP

03:59:23 p.m. 2016-03-16

3/4

ORDERED that The Motion is granted and Marc T. Parrino be and here by is admitted *Pro Hac Vice* and is authorized to appear and participate with other counsel for Bank of America, N.A. in all phases of the trial subject to the following conditions:

1. Marc T. Parrino shall abide by the New Jersey Court Rules including all disciplinary rules, *R. 1:20-1* and *R. 1:28-2*.
2. Marc T. Parrino shall, and hereby does, consent to the appointment of the clerk of the Supreme Court as his/her agent upon whom service of process may be made for all actions against him or his firm that may arise out of his participation in this matter.
3. Marc T. Parrino shall immediately notify the court of any matter affecting his standing at the Bar of any other jurisdiction.
4. Marc T. Parrino shall have all pleadings, briefs and other papers filed with the Court signed by an attorney of record authorized to practice in New Jersey, who shall be held responsible for them, the conduct of the litigation and the attorney admitted herein.
5. Marc T. Parrino cannot be designated as trial counsel.
6. No discovery, motion, trial or any other proceeding delay shall occur or be requested by reason of the inability of Marc T. Parrino to be in attendance.
7. Marc T. Parrino must, with ten (10) days, pay the fees required by *R. 1:20-1(b)* and *R. 1:28-2* and submit an affidavit of compliance.
8. *Pro Hac Vice* admission will automatically terminate for failure to make the initial and any payment required by *R. 1:20-1(b)* and *R. 1:28-2*.
9. Non-compliance with any of the terms of this order shall constitute ground for removal.

Mar. 17. 2016 3:01PM

No. 0702 P. 3


5166786661

Moran Karamouzis LLP

03:59:42 p.m. 2016-03-16

4/4

10. A copy of this order shall be served on all parties within seven (7) days of the date hereof.



Hon. Paula Dow, J.S.C

This motion was opposed _____/unopposed X.

Mar. 14. 2016 9:03AM

No. 0676 P. 1/2

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Attorneys for Plaintiff, Richard Stanhope

FILED
SUPERIOR COURT OF NJ
BURLINGTON COUNTY
MAR 07 2016
Paula T. Dow, P.L.Ch.
RECEIVED

THE KIM LAW FIRM, LLC
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Richard Stanhope

Plaintiff,

v.

Bank of America, N.A., Deborah Carter
Frake, Harry Frake, III, John and Jane Doe
1-5, AND ABC Corps, 1-5.

Defendants.

: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION
: BURLINGTON COUNTY
:
: DOCKET NO.: C-110-14
:
: CIVIL ACTION
:
: ORDER GRANTING PLAINTIFF'S
: MOTION FOR LEAVE TO FILE A
: THIRD AMENDED COMPLAINT

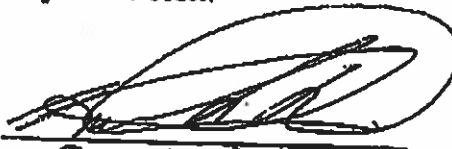
This matter having been brought before the Court upon Motion filed by The Kim Law Firm, LLC, on behalf of Plaintiff Richard Stanhope, for Leave to File a Third Amended Complaint ("Motion"), and the Court having reviewed all papers submitted, and the opposition, if any, by Defendants:

IT IS on this 7th day of March, 2016, ORDERED that:

Mar. 14. 2016 9:04AM

No. 0676 P. 2/2

1. Plaintiff is granted leave to file a Third Amended Complaint, in the same form attached to the Motion.
2. The Third Amended Complaint shall be filed and served upon defendants within seven (7) days of the Movant's receipt of this Order.
3. Plaintiff's counsel shall serve this Order upon Bank of America's counsel within seven (7) days of the date of receipt of this Order.



Paula T. Dow, J.S.C.

☐ Opposed
☒ Unopposed

RECEIVED

MAR 14 2016

DANIEL M. ROSENBERG

ID No.: 023791987
Siobhan E. Moran, Esq.
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Filed with the Court

MAR 07 2016

Paula T. Dow, P.J.Ch.

Attorneys for Plaintiff Bank of America, N.A.

RICHARD STANHOPE,

Plaintiff,

-against-

BANK OF AMERICA, N.A., PNC BANK, N.A.,
DEBORAH and HARRY FRAKE, III, et al,

Defendants,

SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY
CHANCERY DIVISION

CIVIL DIVISION

DOCKET NO.: C-110-14

ORDER

THIS MATTER having been opened to the Court by Siobhan E. Moran of Moran • Karamouzis, LLP, an attorney admitted to the practice of law in the State of New Jersey, to participate with other counsel for Bank of America, N.A. in all phases of trial, and it appearing that Sahily Serradet is a licensed attorney in good standing in the State of Florida, and it appearing that Sahily Serradet has a longstanding attorney-client relationship with Bank of America, N.A. and a background in, knowledge of an experience in legal issues similar to those present in this matter;

The Court having considered the papers and arguments of counsel and for good cause shown;

IT IS on this 7th day of March, 2016

5P

ORDERED that The Motion is granted and Sahily Serradet be and here by is admitted *Pro Hac Vice* and is authorized to appear and participate with other counsel for Bank of America, N.A. in all phases of the trial subject to the following conditions:

1. Sahily Serradet shall abide by the New Jersey Court Rules including all disciplinary rules, *R. 1:20-1* and *R. 1:28-2*.
2. Sahily Serradet shall, and hereby does, consent to the appointment of the clerk of the Supreme Court as his/her agent upon whom service of process may be made for all actions against him or his firm that may arise out of his participation in this matter.
3. Sahily Serradet shall immediately notify the court of any matter affecting his standing at the Bar of any other jurisdiction.
4. Sahily Serradet shall have all pleadings, briefs and other papers filed with the Court signed by an attorney of record authorized to practice in New Jersey, who shall be held responsible for them, the conduct of the litigation and the attorney admitted herein.
5. Sahily Serradet cannot be designated as trial counsel.
6. No discovery, motion, trial or any other proceeding delay shall occur or be requested by reason of the inability of Sahily Serradet to be in attendance.
7. Sahily Serradet must, with ten (10) days, pay the fees required by *R. 1:20-1(b)* and *R. 1:28-2* and submit an affidavit of compliance.
8. *Pro Hac Vice* admission will automatically terminate for failure to make the initial and any payment required by *R. 1:20-1(b)* and *R. 1:28-2*.
9. Non-compliance with any of the terms of this order shall constitute ground for removal.

10. A copy of this order shall be served on all parties within seven (7) days of the date hereof.

A handwritten signature in black ink, appearing to read "Paula Dow", is written over a horizontal line.

Hon. Paula Dow, J.S.C

This motion was opposed _____/unopposed X.

Filed With The Court

FEB 08 2016

Paula T. Dow, J.S.C.

Attorneys for Plaintiff, Richard Stanhope

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LLC

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THE KIM LAW FIRM, LLC

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Richard Stanhope,

Plaintiff,

v.

Bank of America, N.A., PNC Bank, N.A.,
Deborah Carter Frake, Harry Frake, III, John and
Jane Doe 1-5, AND ABC Corps, 1-5.

Defendants.

: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION
: BURLINGTON COUNTY
: CASE NO.: C-110-14

CIVIL ACTION

: ~~ORDER AMENDING THE COURT'S~~
: ~~DECEMBER 28, 2015 ORDER TO~~
: ~~ALLOW PLAINTIFF TO PROCEED~~
: ~~WITH COUNT 6 HIS COMPLAINT~~

DENIED

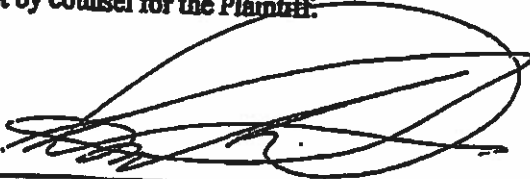
This matter being brought before the Court upon Motion of The Kim Law Firm, LLC,
and Daniel M. Rosenberg & Associates, LLC, the Court having reviewed all papers submitted to
the Court, and arguments of the parties, if any:

IT IS on this 8th day of February, 2016,

(54)

Plaintiff's motion for reconsideration requesting
IT IS ORDERED that the Court's Order of December 28, 2015 ^{be} amended to allow Plaintiff to proceed with Count 6 of his Verified Second Amended Complaint asserting a claim against Bank of America, N.A. for violating the New Jersey Consumer Fraud Act; and **is DENIED**

IT IS FURTHER ORDERED that a copy of this Order shall be served upon counsel for all parties within 7 days of its receipt by counsel for the Plaintiff.



THE HONORABLE PAULA T. DOW, P.J.CH.

Feb. 2. 2016 2:40PM

No. 0439 P. 1/1
Filed with the Court

JAN 25 2016

PREPARED BY THE COURT

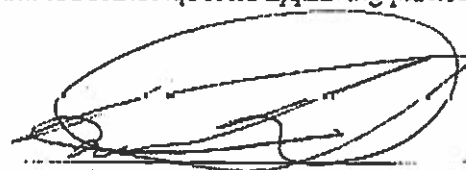
RICHARD STANHOPE, Plaintiff, v. BANK OF AMERICA, N.A., PNC BANK, N.A., DEBORAH and HARRY FRAKE, III, ET AL., Defendants.	<div style="text-align: right;">Paula Dow, J.S.C.</div> SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION BURLINGTON COUNTY DOCKET NO. C-110-14 <hr/> CIVIL ACTION ORDER
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THIS MATTER having come before the Court by way of Plaintiff's Motion to Compel Discovery, with Plaintiff Richard Stanhope being represented by Lisa Duckalow, Esquire; Defendant, Bank of America, being represented by Siobhan D. Moran, Esquire, not appearing, but submitting papers; and Defendants Deborah and Harry Frake not appearing and for good cause shown;

IT IS ON THIS 25th day of January, 2016 ORDERED that:

1. Plaintiff's motion to compel discovery is RESERVED, pending further discussion between the parties;
2. Lead counsel for Plaintiff and Defendant Bank of America are ORDERED to meet and confer by February 3, 2016 in an effort to settle the current discovery dispute;
3. Plaintiff's counsel is to notify the Court by letter, not to exceed 3 pages in length, by part, or to notify the Court of failure of the discussions, in which case the Court shall rule on the pending motion without further briefing or oral argument.

IT IS FURTHER ORDERED that a copy of this order shall be served upon all appearing parties within seven days of its receipt.



Hon. Paula T. Dow, P.J.Ch.

Feb. 2. 2016 2:41PM

No. 0439 P. 1/1
Filed with the Court

JAN 4 5 2016

PREPARED BY THE COURT
RICHARD STANHOPE,

Plaintiff,

v.

**BANK OF AMERICA, N.A., PNC BANK,
N.A., DEBORAH and HARRY FRAKE,
III, ET AL.,**

Defendants.

**CHANCERY DIVISION
BURLINGTON COUNTY****DOCKET NO. C-110-14****CIVIL ACTION****ORDER**

THIS MATTER having come before the Court by way of Plaintiff's Motion to Compel Discovery, with Plaintiff Richard Stanhope being represented by Lisa Buckalew, Esquire; Defendant, Bank of America, being represented by Siobhan E. Moran, Esquire, not appearing, but submitting papers, and Defendants Deborah and Harry Frake not appearing and for good cause shown;

IT IS ON THIS 25th **day of January, 2016 ORDERED that:**

1. Plaintiff's motion to compel discovery is **RESERVED**, pending further discussion between the parties;
2. Lead counsel for Plaintiff and Defendant Bank of America are **ORDERED** to meet and confer by **February 3, 2016** in an effort to settle the current discovery dispute;
3. Plaintiff's counsel is to notify the Court by letter, not to exceed 2 pages in length, by **February 6, 2016**, to either withdraw their motion to compel discovery in full or in part, or to notify the Court of failure of the discussions, in which case the Court shall rule on the pending motion without further briefing or oral argument.

IT IS ORDERED that the Clerk of the Court is to deliver to the parties a copy of this order and the parties are to comply with the terms of this order within seven days of its receipt.

Hon. Paula T. Dow, P.J.Ch.

Filed With The Court

DEC 28 2015

Paula T. Dow, J.S.C.

ID No.: 023791987
Siobhan E. Moran, Esq.
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(516) 678-6661

Attorneys for Plaintiff Bank of America, N.A.

RICHARD STANHOPE,

Plaintiff,

-against-

BANK OF AMERICA, N.A., PNC BANK, N.A.,
DEBORAH and HARRY FRAKE, III, et al,

Defendants,

SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY
CHANCERY DIVISION

CIVIL DIVISION

DOCKET NO.: C-110-14

ORDER

THIS MATTER having been opened to the Court by Siobhan E. Moran of Moran • Karamouzis, LLP counsel for Defendant Bank of America, N.A., seeking an Order dismissing Plaintiff's Complaint, dated September 24, 2015, as against Bank of America, pursuant to New Jersey Court Rule 4:6-2 (e) for failure to state a claim upon which relief can be granted; and

The Court having considered the papers and arguments of counsel and for good cause shown,

IT IS on this 28th day of December, 2015:

ORDERED that Plaintiff's Complaint is hereby dismissed ^(as to Count 6) with prejudice as to Bank of America, N.A.; and

FURTHER ORDERED that Defendant Bank of

ENTERED ON ACES

America's motion to dismiss Counts 2 through 5
of Plaintiff's Complaint is DENIED


Paula T. Dow, J.S.C.

Paula T. Dow, P.J. Ch.

This motion was opposed X /unopposed _____.

Filed With The Court

DEC 28 2015

PREPARED BY THE COURT

Paula T. Dow, J.S.C.

<p>RICHARD STANHOPE, Plaintiff,</p> <p>v.</p> <p>BANK OF AMERICA, N.A., PNC BANK, N.A., DEBORAH and HARRY FRAKE, III, ET AL.,</p> <p>Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION BURLINGTON COUNTY</p> <p>DOCKET NO. C-110-14</p> <p>CIVIL ACTION</p> <p>CASE MANAGEMENT ORDER</p>
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THIS MATTER having come before the Court by way of Case Management on December 8, 2015, with Plaintiff Richard Stanhope being represented by Lisa Buckalew, Esquire; Defendant, Bank of America, being represented by Siobhan E. Moran, Esquire; and Defendants Deborah and Harry Frake not appearing and for good cause shown;

IT IS ON THIS 28th day of December, 2015 ORDERED that:

1. All written discovery requests (document requests and interrogatories) shall be propounded and responded to by February 1, 2016,
2. Designations of expert witnesses must be submitted by February 1, 2016.
3. All depositions of fact witnesses and expert witnesses, if any, shall be completed by April 1, 2016.
4. A case management conference is scheduled for March 30, 2016
5. The parties shall file any dispositive motions herein by April 15, 2016.
6. All pre-trial submissions, including but not limited to, pre-trial memoranda, witness lists, pre-marked exhibits, and anticipated number of trial dates are to be submitted to the Court, with a courtesy copy to your adversary, on or before May 29, 2016.
7. A Pre-Trial Conference in this matter is scheduled for May 4, 2016
8. This matter is scheduled for trial on June 6, 2016, at 9:00 AM. Please note that the case can be called for trial anytime during the week of June 6th.

ENTERED ON FILE

IT IS FURTHER ORDERED that a copy of this order shall be served upon all appearing parties within seven days of its receipt.

A handwritten signature in black ink, appearing to be "Paula T. Dow", is written over a horizontal line. The signature is stylized with large, sweeping loops.

Hon. Paula T. Dow, P.J.Ch.

Filed With The Court

NOV 16 2015

PREPARED BY THE COURT

Paula T. Dow, J.S.C.

RICHARD STANHOPE,**Plaintiff,****v.****BANK OF AMERICA, N.A., PNC BANK,
N.A., DEBORAH CARTER FRAKE,
HARRY FRAKE, III, JOHN AND JANE
DOE 1-5, AND ABC CORPS, 1-5,****Defendants.****SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
BURLINGTON COUNTY****DOCKET NO. C-110-14****CIVIL ACTION****CASE MANAGEMENT ORDER**

THIS MATTER having come before the Court, Plaintiff being represented by Daniel E. Rosenberg, Esquire and Defendants being represented by Siobhan E. Moran, Esquire and for good cause shown;

IT IS ON THIS 16th day of November, 2015 ORDERED that:

1. A case management conference is scheduled for December 8, 2015, at 9:00 AM. Please mark your calendars accordingly.

IT IS FURTHER ORDERED that a copy of this order shall be served upon all appearing parties within seven days of its receipt.



Hon. Paula T. Dow, P.J.Ch.